

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

NEW JERSEY DEPARTMENT OF  
ENVIRONMENTAL PROTECTION, et al.,

Plaintiffs,

v.

E. I. DU PONT DE NEMOURS AND  
COMPANY, et al.,

Defendants.

Civil Action No. 1:19-cv-14766-RMB-JBC  
Hon. Renée Marie Bumb, Chief U.S.D.J

ORAL ARGUMENT REQUESTED

**NOTICE OF PLAINTIFFS' OMNIBUS RESPONSE  
TO DEFENDANTS' MOTIONS TO STRIKE PLAINTIFFS' JURY DEMAND**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that on February 11, 2025, or as soon thereafter as counsel may be heard, plaintiffs New Jersey Department of Environmental Protection, the Commissioner of the New Jersey Department of Environmental Protection, and the Administrator of the New Jersey Spill Compensation Fund (collectively, "State" or "Plaintiffs") shall move before the Honorable Renée M. Bumb, Chief District Judge at the United States District Court for the District of New Jersey, Michell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Courtroom 3D, Camden, New Jersey 08101, for an order denying Defendants' motions to strike Plaintiffs' jury demand;

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs will rely on the accompanying Omnibus Response to Defendants' Motions to Strike Plaintiffs' Jury Demand, the Declaration of Geoffrey W. Castello, III, and the exhibits attached thereto;

**PLEASE TAKE FURTHER NOTICE** that a proposed order is annexed hereto pursuant to Local Civil Rule 7.1(e).

Dated: February 4, 2025

Respectfully submitted,

/s/ Geoffrey W. Castello  
Geoffrey W. Castello

**Certificate of Service**

The undersigned certifies that on February 4, 2025, copies of the appended Omnibus Response to Defendants' Motions to Strike Plaintiffs' Jury Demand, the Declaration of Geoffrey W. Castello in Support, and Exhibits 1-4 were filed electronically. Notice of this filing will be sent to the parties by operation of the Court's Electronic Filing System.

/s/ Geoffrey W. Castello  
Geoffrey W. Castello